

Message Text

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ACTION EUR-12

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VANCE PLANE PASS TARNOFF AND FISCHER

PASS TREASURY FOR ROSENBLUM (INTERNATIONAL TAX COUNSEL)

E.O. 11652: N/A
TAGS: EFIN, OECD
SUBJECT: NORWEGIAN DEMARCHE AT OECD MINISTERIAL ON
DOUBLE TAXATION AGREEMENT WITH U.S.

1. DCM OF NORWEGIAN PERMANENT DELEGATION (RAA) ADVISES
THAT GON FINANCE MINISTER KLEPPE -- ACTING ON BEHALF
OF FOREIGN MINISTER FRYDENLUND, WHO IS ILL AND CANNOT
ATTEND -- WISHES TO PRESENT LETTER FROM FRYDENLUND
AND AIDE MEMOIRE TO SECRETARY VANCE DURING OECD
MINISTERIAL MEETING CONCERNING US-GON DOUBLE TAXATION
AGREEMENT. QUESTION REPORTEDLY CONCERNS INTERPRETATION
OF CERTAIN PROVISIONS REGARDING DEDUCTION IN U.S. OF
TAXES PAID IN NORWAY BY U.S. COMPANIES PARTICIPATING
IN NORTH SEA OIL ACTIVITIES.

2. MISSION HAS WARNED NORWEGIAN DELEGATION THAT BOTH
SECRETARY VANCE AND SECRETARY BLUMENTHAL WOULD HAVE
DIFFICULTY FINDING ROOM ON THEIR SCHEDULES. WE HAVE
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ALSO POINTED OUT USG LEAD AGENCY ON DOUBLE TAX
QUESTIONS IS TREASURY. WE HAVE TOLD NORWEGIAN PERM
DEL THAT WE SHOULD BE ABLE TO RESPOND TO REQUEST ON
WEDNESDAY MORNING, BEFORE OPENING SESSION OF MINISTERIAL.

3. FYI: OECD COMMITTEE ON FISCAL AFFAIRS WILL BE MEET-
ING NEXT WEEK (JUNE 21 AND 22), AND THUS US TAX OFFICIALS

WOULD HAVE EARLY OPPORTUNITY TO RESPOND BILATERALLY TO
SUBSTANTIVE QUESTIONS CONCERNING TAX POLICY.
SALZMAN

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Message Attributes

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